

Preliminary Response
U.S. Application No. 09/544,544

information (i.e., claim 1). The Examiner maintains that Applicant cannot show nonobviousness by attacking references individually when the rejection is based on a combination of references. However, since Applicant demonstrated, in the January 27, 2004 Amendment, that Dinkin appears to teach away from using received packet information to send a broadcast packet to a domain other than the first domain, Applicant submits that any arguments regarding the “type” of information provided in the packet is irrelevant (i.e. since Dinkin teaches away from sending the claimed broadcast packets to other domains based on information in an “acquired” packet).

For example, as set forth in the January 27, 2004 Amendment, if the results of all searches in the PPN Network 102 (i.e. alleged first domain) and the Interface Node (i.e. alleged host of first domain) are negative, the control point 206 (CP 206) of the Interface Node 126 performs an extended search of the Sub Area Network 104 (i.e. alleged domain other than first domain) (pg. 10). However, it appears that any information regarding the Sub Area Network 104 is predetermined or preset in the CP 206 (col. 8, lines 33-37).

For example, there is no disclosure that the extended search information in the CP 206 is based on any information previously received by the alleged host of the first domain, i.e. the Interface Node. In particular, there is no disclosure that a packet is received by the Interface Node 126, regarding the Sub Area Network 104, prior to the Interface Node 126 sending a broadcast packet to the Sub Area Network 104, i.e., if the information is predetermined or preset in the CP 206, then there is no packet that needs to be acquired from the host before performing the extended search. If there is no packet to acquire, then it logically follows that there is no need for Applicant to provide arguments based on the “type” of information that would be

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provided in the non-existent packet (i.e. to discuss whether or not France discloses that packets can be provided with “routing” information). For this reason, Applicant merely argued that France “fails to cure the deficient teachings of Dinkin” (pg. 10).

Regarding claim 2, the Examiner maintains that Applicant has not provided any explanation for the position being taken (attachment to Advisory Action). However, Applicant respectfully disagrees.

For example, as set forth in the January 27, 2004 Amendment, for purposes of claim 1, the Examiner maintains that the Interface Node of Dinkin discloses the claimed “host”. However, in regard to claim 2, it appears that the Examiner maintains that the Interface Node does not disclose the host, but rather, discloses the claimed “interworking unit”, i.e., where claim 2 positively recites both a host and an interworking unit. Based on the Examiner’s alternate interpretation, Dinkin does not appear to teach or suggest a “host”. In particular, if the Interface Node allegedly discloses the claimed interworking unit, then Applicant respectfully requests the Examiner to indicate which portion of Dinkin discloses the claimed host (i.e., where the host fulfills the claimed limitations of sending routing information request packets, and sending and receiving broadcast packets, etc., as recited in claim 2).

In regard to claim 16, the Examiner maintains that if the broadcast message is sent to “all” domains, then the first broadcast will be sent to the domain with the fewest hop counts. However, there is no broadcast order provided in Dinkin. Although the broadcast can be sent to all domains, there is no suggestion of which order in which all of the domains will receive the broadcast. It appears the Examiner is assuming that the “first” broadcast will be sent to the

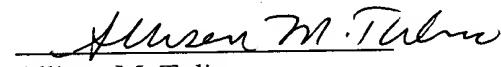
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domain with the fewest hop counts, or alternatively that the first broadcast is sent to all domains at the same time, such that the domain with the fewest hop counts receives the first broadcast. However, without any specific disclosure in Dinkin to demonstrate this reasoning, Applicant respectfully disagrees with the Examiner, and submits that claim 16 is patentable over the cited references.

If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,


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